



July 11, 2012

Mr. Phil Isenberg, Chair
Delta Stewardship Council
980 9th Street, Suite 1500
Sacramento, California 95814

Via E-Mail

deltaplancomment@deltacouncil.ca.gov

Re: Sixth Draft Delta Plan – Discussion of Water Code Section 85021

Dear Mr. Isenberg:

The Northern California Water Association and the Regional Water Authority would like to reiterate our opposition to portions of the Delta Plan that would interpret Water Code section 85021 as applying to the Delta watershed – whether through policies, recommendations or performance measures – a metric stating that “a significant reduction in the amount of water used or in the percentage of water used from the Delta watershed” could be necessary to show consistency with that statute. Such a metric is unworkable for agencies in the Delta watershed, which are necessarily dependent on local water sources. In addition, such a metric is inconsistent with the Delta Reform Act itself, which protects watershed agencies’ ability to use those local sources under the area-of-origin laws and to exercise their water rights. (Water Code §§ 85031(a), 85032(i).)

Very truly yours,

NORTHERN CALIFORNIA WATER
ASSOCIATION

David Guy
President

REGIONAL WATER AUTHORITY

John Woodling
Executive Director